

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In re:

**Bluepoint Medical Associates, LLC**

Debtor

**Case No. 19-13121-KHK**

Chapter 11

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**MOTION TO EXPEDITE HEARING**

Wisteria 12810, LLC, by counsel, has filed a Motion for Relief from the Automatic Stay. For the reasons stated in the Motion, and due to the fact that the Movant is not adequately protected, that the damages to the Movant are ongoing and that there is an urgent health issue, the Movant respectfully requests an expedited hearing to be held on November 12, 2019 at 11:00 a.m. in Judge Kindred's Courtroom, U.S. Bankruptcy Court, Courtroom III, 200 South Washington Street, Alexandria, VA.

WISTERIA 12810, LLC  
By Counsel

Dated: October 24, 2019

NEW DAY LEGAL, PLLC

By: /s/ John C. Morgan

John C. Morgan, Esquire, VSB # 30148

Scott W. Carpenter, Esquire, VSB # 89057

Suad Bektic, Esquire, VSB # 90012

98 Alexandria Pike, Suite 10

Warrenton, Virginia 20186

Phone: (540) 349-3232

Facsimile: (888) 612-0943

*Counsel for Wisteria 12810, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of October 2019, I have provided a copy of the foregoing Motion to Expedite Hearing via the CM/ECF system or by first-class, postage paid mail, to the following:

Office of the United States Trustee  
1725 Duke Street, Suite 650  
Alexandria, VA 22314

John T. Donelan, Esquire  
125 South Royal Street  
Alexandria, VA 22314  
*Counsel for the Debtor*

/s/ John C. Morgan  
John C. Morgan

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**CERTIFICATION FOR EXPEDITED HEARING**

Wisteria 12810, LLC, by its undersigned counsel, has filed a Motion for Relief from the Automatic Stay. In support thereof, as required by Local Rule 9013-1(N), John C. Morgan, as counsel for the Movant, hereby certifies the following:

1. I am a member of the Bar of this Court;
2. I have carefully examined the matter and have concluded that there is a true necessity for an emergency hearing;
3. The necessity for this emergency has not been caused by any lack of due diligence; and
4. Based upon the nature of this matter and the relief requested in the Motion to Expedite Hearing, no *bona fide* effort to resolve the matter without a hearing is possible.

By: /s/ John C. Morgan  
John C. Morgan, Esq. VSB # 30148  
Scott W. Carpenter, Esq. VSB # 89057  
Suad Bektic, Esq. VSB # 90012  
New Day Legal, PLLC  
98 Alexandria Pike, Suite 10  
Warrenton, Virginia 20186  
Phone: (540) 349-3232  
Facsimile: (888) 612-0943  
*Counsel for Wisteria 12810, LLC*

**CERTIFICATE OF SERVICE**

Pursuant to Local Bankruptcy Rule 9013-1, I hereby certify that on October 24, 2019, I have transmitted a true copy of the foregoing Motion to Expedite Hearing and Certification for Expedited Hearing electronically through the Court's CM/ECF system or by first-class, postage paid mail, to the following:

Office of the United States Trustee  
1725 Duke Street, Suite 650  
Alexandria, VA 22314

John T. Donelan, Esquire  
125 South Royal Street  
Alexandria, VA 22314  
*Counsel for the Debtor*

/s/ John C. Morgan  
John C. Morgan